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VALERIE MARCHAND

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

VALERIE MARCHAND,  
  
Plaintiff,  
  
v.  
  
NORTHROP GRUMMAN  
CORPORATION,  
  
Defendant.

Case No. 5:16-cv-06825-BLF

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE SEPTEMBER 25,  
2018, ADR DEADLINE**

Hon. Beth Labson Freeman

Plaintiff VALERIE MARCHAND ("Plaintiff") and Defendant NORTHROP GRUMMAN CORPORATION ("Defendant"), collectively referred to herein as "the Parties," by and through their undersigned counsel, hereby stipulate as follows:

**WHEREAS**, on April 30, 2018, the Parties submitted a Joint Stipulation and Proposed Order Selecting ADR Process and pursuant to the Stipulation, agreed to participate in mediation on or before July 10, 2018. The Court signed the Stipulation and Proposed Order without modifications;

**WHEREAS**, on May 14, 2018, the Court appointed Philip L. Gregory, Esq. to serve as the mediator for the Parties;

**WHEREAS**, the Parties were unable to obtain and schedule a mutually available mediation date prior to the initial July 10, 2018, cutoff to complete mediation;

**WHEREAS**, the Parties reserved and scheduled a mediation date on September 24, 2018, with Philip L. Gregory and requested that this Court continue the deadline to complete mediation to September 25, 2018. The request was granted by this Court on July 9, 2018;

**WHEREAS**, on September 18, 2018, mediator Philip L. Gregory informed the Parties that due to a witness rescheduling a pending deposition, Mr. Gregory would have to travel out of the state and would not be able to mediate the case on Monday, September 24, 2018;

**WHEREAS**, the first date on which all Parties and mediator Mr. Gregory are available to conduct the mediation is Wednesday, November 14, 2018;

**NOW THEREFORE**, it is hereby stipulated and agreed as follows:

1. The Parties will participate in mediation on November 14, 2018.
2. The ADR cutoff date should be continued to November 15, 2018.

Dated: September 25, 2018

/s/ *Adam J. Fiss*

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ADAM J. FISS

JOSE MACIAS, JR.

LITTLER MENDELSON, P.C.

Attorneys for Defendant

NORTHROP GRUMMAN CORPORATION

Dated: September 25, 2018

/s/ Grainne M. Callan

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GRAINNE CALLAN

RICHARD SCHRAMM

EMPLOYMENT RIGHTS ATTORNEYS

Attorneys for Plaintiff

VALERIE MARCHAND

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**ORDER**

Upon the Parties' stipulation, and for good cause, it is HEREBY ORDERED that the September 25, 2018, deadline to complete ADR is continued to November 15, 2018.

**IT IS SO ORDERED.**

**Dated:** September 26, 2018

  
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**Hon. Beth Labson Freeman**  
**United States District Court Judge**